

North Pacific Marine Radio Council

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July 6, 2004

**Reply Comments by North Pacific
Marine Radio Council concerning:
WT Docket No. 00-48 and
RM-9499 Second FNPRM**

Secretary
Federal Communications Commission
445 12th Street S.W.
TW-325
Washington, D.C. 20554

The following reply comments by the North Pacific Marine Radio Council (NPMRC) are in response to the Second FNPRM in WT Docket No. 00-48, released by the Commission on January 12, 2004. The NPMRC reply comments are directed to VHF-DSC transceivers used as installed radios on voluntary vessels.

NPMRC recommends that Part 80 of the Commissions Rules be specifically amended to provide a grandfather clause that would allow the continued installation and use of all VHF-DSC Marine Radios which were type excepted at the time of manufacture.

We would recommend that the ninety day period proposed by RTCM as Part 80.225(a)(1) be extended to one year as the date at which these rules will become effective is not predicable at this time. NPMRC recommends that the three year period proposed by RTCM as Part 80.225 (a) (2) be changed to read one year after the USCG establishes Sea Area A-1.

Sincerely,

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